

Exhibit 25
(Excerpt)
(Redacted)

In the Matter Of:

United States of America v

Google, LLC

JUDITH CHEVALIER, PH.D.

March 05, 2024



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[REDACTED]

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[REDACTED]

16 Q. So they are not surveys of
17 advertisers and their perception of
18 quality, right?

19 A. The particular survey items
20 that I'm looking at are perception -- are
21 publisher surveys. I've seen both
22 publisher and advertiser surveys in other
23 sources, and I can't say if Advertiser
24 Perceptions, given its name, has

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1 advertiser perception surveys. But these
2 are SSP performance surveys, and they are
3 surveys of publishers.

4 Q. And when you say SSP, do you
5 have an understanding of whether those
6 surveys were about ad exchanges,
7 publisher ad servers, some combination of
8 the two?

9 MR. JUSTUS: Objection.
10 Form.

[REDACTED]

18 BY MS. CLEMONS:
19 Q. And is it your understanding
20 that the other SSPs included in the
21 survey include publisher ad servers and
22 ad exchanges and integrated publisher ad
23 server ad exchanges?
24 A. I don't remember. I'm not

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1 sure, specifically, but my -- certainly
2 includes exchanges, some of which
3 probably have integrated publisher ad
4 servers. But I don't -- I don't recall.

[REDACTED]

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[REDACTED]

5 MR. JUSTUS: Objection.

6 Form.

7 You can go ahead.

[REDACTED]

20 BY MS. CLEMONS:

21 Q. Is it possible that some of

22 the perceived quality differences in

23 those surveys between Google Ad Manager

24 and non-Google products is a function of

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1 those non-Google products not having a

2 publisher ad server?

3 MR. JUSTUS: Objection.

4 Form.

5 THE WITNESS: Again, I

6 think it would be difficult to --

7 I think it would be difficult to

8 assess that completely, given

9 what I've looked at. Though,

10 it's possible that one could

11 parse that out if that was a

12 source of particular focus.

13 BY MS. CLEMONS:

14 Q. And do you have any

15 understanding of what percentage of

16 publishers use Google's DoubleClick for

17 Publisher as their publisher ad server

18 for display advertising?

19 MR. JUSTUS: Objection.

20 Form.

21 THE WITNESS: So my

22 understanding is it's quite high,

23 but I don't recall, off the top

24 of my head, what. And, of

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1 course, like, the fraction would

2 depend on how we defined

3 publisher, et cetera.

4 BY MS. CLEMONS:

5 Q. And so if a quite high

6 percentage of publishers use Google's

7 publisher ad server product for their

8 display advertising, does that affect how

9 you view the results of these surveys

10 that ask about Google's combined Google

11 Ad Manager product?

12 MR. JUSTUS: Objection.

13 Form.

14 THE WITNESS: So I think

15 these -- you know, Google has

16 gone to some -- you know, my

17 understanding is that Google has

18 chosen to integrate these

19 products as part of improving the

20 functionality of these products,

21 and if publishers value that, and

22 that's reflected in the survey,

23 I -- you know, I don't think

24 that's necessarily a

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1 methodological concern of the

2 survey.

3 BY MS. CLEMONS:

4 Q. But can you tell whether

5 those publishers and their assessments of

6 quality are reflective of the publisher

7 ad server or the ad exchange or the

8 combined publisher ad server and ad

9 exchange?

10 MR. JUSTUS: Objection.

11 Form.

12 THE WITNESS: So, again, I

13 have not parsed these surveys for

14 that purpose, so I won't say what

15 is possible. I don't recall

16 Professor Simcoe doing that in

17 his rebuttal, either.

18 But certainly -- certainly,

19 you know, that one could

20 potentially do that, but I

21 haven't undertaken a study of

22 that.

23 So, for example, you know,

24 alignment with publisher goals

Attorney Errata Sheet for the Transcription of Judith A. Chevalier

Case Name: *United States et al v. Google LLC*, No. 1:23-cv-00108-LMB-JFA (E.D. Va.)

Depo. Date: March 5, 2024

Deponent: Judith A. Chevalier

Page	Line	Original	Correction	Reason for Correction
3	21	Yin Jia Qiu – Economist (US DOJ) – zoom	Yin Jia Qiu – Economist (US DOJ) – in person	Transcription Error
26	23	“I would love details.”	“I would love details. Yes.”	Transcription Error
26	24	“Yes. Thanks. Sorry.”	“Thanks. Sorry.”	Transcription Error
40	13	“I really couldn’t single out”	“I really wouldn’t single out”	Transcription Error
74	15	“Google’s DV360 and Google’s ad products?”	“Google’s DV360 and Google Ads products?”	Transcription Error
77	11	“purchased through Xandr”	“purchased through Xandr’s”	Transcription Error
86	10	“during, before, or after videos”	“during, before, or after other videos”	Transcription Error
86	11	“videos that display in a display”	“videos that play in a display”	Transcription Error
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
182	11-12	“refer to as advertiser perception surveys”	“refer to as Advertiser Perceptions surveys”	Clarification
182	16	“from the advertiser perception survey”	“from the Advertiser Perceptions survey”	Clarification
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
196	24	“targeting or pricing algorithms for”	“targeting or pricing algorithms or”	Transcription Error
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
226	24	“He didn’t do an”	“I didn’t do an analysis”	Transcription Error
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date: April 9, 2024 Signature: /s/ Katherine E Clemons